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19 *Attorneys for Plaintiff Snap Lock Industries, Inc.*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 **SNAP LOCK INDUSTRIES, INC.,**

23 Case No. 2:17-cv-02742-RFB-BNW

24 Plaintiff,

25 **STIPULATION FOR EXTENSION OF**
CASE MANAGEMENT DEADLINES FOR
CONDUCTING DEPOSITIONS

26 **SWISSTRAX CORPORATION,**

27 **(SECOND REQUEST)**

28 Defendant.

29 Plaintiff Snap Lock Industries, Inc. (“Snap Lock”) and Defendant Swisstrax Corporation
30 (“Swisstrax”) (collectively, “Parties”), through their undersigned counsel, hereby stipulate and agree
31 to extend certain case management deadlines, as set forth more fully below.

32 1. Although the parties scheduled all expert depositions in this case prior to the March 13,
33 2020, deadline for conducting expert discovery, and completed two expert depositions prior to the
34 deadline, based on travel restrictions in effect due to the Covid-19 pandemic and the parties’ and expert
35 witnesses’ concern regarding travel, the parties agreed to continue the depositions and requested an
36 additional 45 days to complete expert discovery. *See* ECF No. 152.

1 2. On March 13, 2020, the Court granted the Parties' Stipulation and extended certain case
2 management deadlines, including extending the last day to complete expert discovery to April 27,
3 2020. *See* ECF No. 153.

4 3. Unfortunately, since that time, the restrictions and concerns regarding the Covid-19
5 pandemic have only intensified and the states where the expert witnesses and counsel for the parties
6 reside are all under stay-at-home directives or mandatory stay-at-home orders. In addition, some of
7 the expert witnesses lack technology for video-conferencing, making preparing for and taking remote
8 depositions difficult. Moreover, if certain of the experts are required to travel for depositions, they
9 may be in violation of State executive orders. Due to these restrictions, and the parties' and witnesses'
10 concern regarding the virus, the parties hereby request an additional sixty (60) days to complete expert
11 discovery. The parties are working together to reschedule the four remaining expert depositions within
12 the newly extended expert discovery deadline. The parties also agree to extend the dispositive motion
13 deadline and the date to file the joint pretrial order to maintain the timing of the deadlines following
14 the close of expert discovery. Accordingly, the parties respectfully request that the Court enter an
15 Order regarding case deadlines as follows:

DEADLINE	CURRENT DATE	PROPOSED DATE
Last day to complete expert discovery	April 27, 2020	June 26, 2020
Dispositive motion deadline	May 27, 2020	July 27, 2020
Date to file joint pretrial order	June 29, 2020	August 26, 2020

22 4. The Parties do not currently have a trial date. Good cause exists for this request. The
23 Parties are not seeking the continuance for purposes of undue delay.

24 5. Pursuant to the initial Scheduling Order in this case (ECF No. 59), in the event
25 dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days
26 after a decision on the dispositive motions. In addition, the disclosures required by Fed. R. Civ. P.
27 26(a)(3), and any objections thereto, shall be included in the pretrial order (*id.*).

Dated this 7th day of April, 2020.

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IT IS SO ORDERED:

Hon. Brenda Weksler
United States Magistrate Judge

DATED: 4/8/2020

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of April, 2020, the foregoing **STIPULATION FOR EXTENSION OF CASE MANAGEMENT DEADLINES FOR CONDUCTING DEPOSITIONS** was served to all counsel of record via the Court's CM/ECF system.

/s/ Tamara L. Kapaloski